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GENERAL ROAD CONTRACTORS

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October 16, 2003

National Highway Traffic Safety Administration
Docket Room PL-401
400 Seventh Street, S.W.
Washington, D.C. 20590

RE: NHTSA Docket 03-14396 - 4

Dear NHTSA Docket:

Central Specialties, Inc. owns and operates controlled horizontal discharge trailers in its highway construction business. Central Specialties likes to use these trailers to deliver asphalt and other paving materials because we can control the delivery of the construction material better than with dump trucks, reducing the chances of spills and accidents at the job site.

We also like the fact that horizontal discharge trailers reduce or prevent asphalt material segregation during delivery. That makes the construction material more durable, resulting in better roads. Dump trucks cannot prevent segregation, so the asphalt they deliver is lower quality.

The manufacturers of these trailers have told us that they may have to suspend production of them, unless your agency grants them an exemption from a rule requiring rear guards on the back of the trailers. Since rear guards would prevent the trailers from backing up to the pavers, they cannot be installed on these trailers.

We understand that these manufacturers considered building a sliding guard that would be moved out of the way when delivering asphalt. We are opposed to that kind of a sliding guard because our employees would have to move the guard out of the way before starting the asphalt delivery, and would have to move it back after the delivery. We think that this could be unsafe for our employees. We also think that we would have higher maintenance costs because some of the hot asphalt would set in the sliding guard and would have to be cleaned regularly, or it will stop working. For these reasons, we do not think a sliding guard is a good idea.

Central Specialties supports your proposal to give these manufacturers an exemption from the rear guard rule. Please consider these comments when you make your decision.

Sincerely,

Steve Minnerath
Manager

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